



BellSouth Telecommunications, Inc.

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July 17, 2000

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EXECUTIVE SECRETARY

VIA HAND DELIVERY

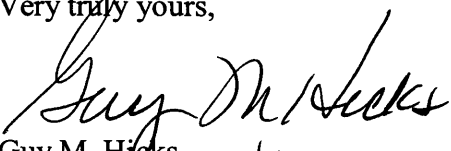
David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Petition for Arbitration of the Interconnection Agreement Between BellSouth Telecommunications, Inc. and Intermedia Communications Inc. Pursuant to Section 252(b) of the Telecommunications Act of 1996*
Docket No. 99-00948

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth Telecommunications, Inc.'s Objections to Intermedia's First Request for Production of Documents. Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,


Guy M. Hicks
with permission (ch)

GMH:ch
Enclosure

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

IN RE: *Petition for Arbitration of the Interconnection Agreement Between BellSouth Telecommunications, Inc. and Intermedia Communications, Inc. Pursuant to Section 252(b) of the Telecommunications Act of 1996*

Docket No. 99-00948

BELLSOUTH TELECOMMUNICATIONS, INC.'S OBJECTIONS TO
INTERMEDIA'S FIRST REQUEST FOR PRODUCTION

BellSouth Telecommunications, Inc. ("BellSouth") respectfully submits the following objections to the Request for Production of Intermedia Communications, Inc. ("Intermedia").

GENERAL OBJECTIONS

1. BellSouth objects to each Request to the extent that it purports to impose upon it any obligations more onerous or far reaching than those provided for in the Tennessee Rules of Civil Procedure or any other applicable statute, rule, or regulation.
2. BellSouth objects to each Request to the extent it would require BellSouth to reveal information or documents that are protected from disclosure by the attorney-client privilege, the work-product doctrine, or any other applicable privilege.
3. BellSouth objects to each and every Request insofar as the Request is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. BellSouth objects to each Request to the extent that it is not addressed to the remaining issues to be arbitrated in this proceeding or that it relates to issues that have been withdrawn from the proceeding. BellSouth will attempt to note each instance where this objection applies.

4. BellSouth objects to each Request to the extent that it would require BellSouth to create or produce a document it does not maintain in the ordinary course of business.

5. BellSouth objects to each and every Request, insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.

6. BellSouth has interpreted Intermedia's Requests to apply to BellSouth's regulated intrastate operations in Tennessee and will limit its answers accordingly. To the extent that any Request is intended to apply to matters other than Tennessee intrastate operations subject to the jurisdiction of the Authority, BellSouth objects to such Request to produce as irrelevant, overly broad, unduly burdensome and oppressive.

7. BellSouth objects to the Definitions and Instructions to these Request for Production to the extent that they seek electronic copies (e.g., diskettes). BellSouth will produce hard copies of responsive documents.

SPECIFIC OBJECTIONS TO REQUESTS FOR PRODUCTION

Request for Production No. 2: Produce any and all effective interconnection agreements between BellSouth and other telecommunications carriers that provide for reciprocal compensation at *elemental* interconnection rates.

Objection: BellSouth objects to this request for production on the grounds that it is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

BellSouth further objects to this request for production on the grounds that it seeks the production of documents that are on file with the Tennessee Regulatory Authority, are publicly available and therefore are obtainable from another source that is more convenient, less burdensome, or less expensive.

Request for Production No. 3: Produce any and all effective interconnection agreements between BellSouth and other telecommunications carriers that provide for reciprocal compensation at *composite* rates.

Objection: BellSouth objects to this request for production on the grounds that it is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

BellSouth further objects to this request for production on the grounds that it seeks the production of documents that are on file with the Tennessee Regulatory Authority, are publicly available and therefore are obtainable from another source that is more convenient, less burdensome, or less expensive.

Request for Production No. 4: Produce any and all documents, including diagrams, schematics, or illustrations showing the manner in which BellSouth terminates local calls originated by other telecommunications carriers.

Objection: BellSouth objects to this request for production on the grounds that it is overly broad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Production No. 5: Produce any and all documents, including diagrams, schematics, or illustrations showing the manner in which BellSouth originates local calls and terminates those calls to other telecommunications carriers.

Objection: BellSouth objects to this request for production on the grounds that it is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Production No. 6: Produce any and all documents, including diagrams,

schematics, or illustrations showing the manner in which other telecommunications carriers terminate local calls originated by BellSouth.

Objection: BellSouth objects to this request for production on the grounds that it is vague, overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Production No. 7: Produce a diagram, illustration, or schematic of BellSouth's network in Tennessee showing how its central offices are interconnected.

Objection: BellSouth objects to this request for production on the grounds that it is overly broad and unduly burdensome and oppressive and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Production No. 9: Produce a diagram, schematic, or illustration of BellSouth's circuit-switched network in Tennessee showing how its circuit-switched network is interconnected with the circuit-switched networks of other telecommunications carriers with whom it interconnects.

Objection: BellSouth objects to this request for production on the grounds that it is overly broad and unduly burdensome and oppressive and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Production No. 10: Produce a diagram, schematic, or illustration of BellSouth's packet-switched network in Tennessee showing how its packet-switched network is interconnected with the packet-switched networks of other telecommunications carriers with whom it has interconnection agreements.

Objection: BellSouth objects to this request for production on the grounds that it is overly broad and unduly burdensome and oppressive and not reasonably calculated to lead to the

discovery of admissible evidence.

Request for Production No. 14: Produce any and all Authority decisions which have found that a competing telecommunications carrier's switch serves an area comparable to that served by BellSouth's tandem switch.

Objection: BellSouth objects to this request for production on the grounds that it seeks the production of documents that are on file with the Tennessee Regulatory Authority, are publicly available and therefore are obtainable from another source that is more convenient, less burdensome, or less expensive.

Request for Production No. 15: Produce any and all Authority decisions which have found that a competing telecommunications carrier's switch provides the same functionality as that provided by BellSouth's tandem switch.

Objection: BellSouth objects to this request for production on the grounds that it seeks the production of documents that are on file with the Tennessee Regulatory Authority, are publicly available and therefore are obtainable from another source that is more convenient, less burdensome, or less expensive.

Request for Production No. 16: Produce any and all Authority decisions which have found that a competing telecommunications carrier's switch *does not* serve an area comparable to that served by BellSouth's tandem switch.

Objection: BellSouth objects to this request for production on the grounds that it seeks the production of documents that are on file with the Tennessee Regulatory Authority, are publicly available and therefore are obtainable from another source that is more convenient, less burdensome, or less expensive.

Request for Production No. 17: Produce any and all Authority decisions which have

found that a competing telecommunications carrier's switch *does not* provide the same functionality as that provided by BellSouth's tandem switch.

Objection: BellSouth objects to this request for production on the grounds that it seeks the production of documents that are on file with the Tennessee Regulatory Authority, are publicly available and therefore are obtainable from another source that is more convenient, less burdensome, or less expensive.

Request for Production No. 19: Produce any and all Authority decisions which address the rates for virtual and physical collocation, including but not limited to, space preparation/conditioning charges.

Objection: BellSouth objects to this request for production on the grounds that it seeks the production of documents that are on file with the Tennessee Regulatory Authority, are publicly available and therefore are obtainable from another source that is more convenient, less burdensome, or less expensive.

Request for Production No. 20: Produce any and all effective interconnection agreements between BellSouth and other telecommunications carriers which reflect the space preparation rates established and/or approved by the Authority.

Objection: BellSouth objects to this request for production on the grounds that it seeks the production of documents that are on file with the Tennessee Regulatory Authority, are publicly available and therefore are obtainable from another source that is more convenient, less burdensome, or less expensive.

Request for Production No. 22: Produce copies of all effective interconnection agreements between BellSouth and other telecommunications carriers in Tennessee which provide for virtual-to-physical collocation conversions.

Objection: BellSouth objects to this request for production on the grounds that it is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

BellSouth further objects to this request for production on the grounds that it seeks the production of documents that are on file with the Tennessee Regulatory Authority, are publicly available and therefore are obtainable from another source that is more convenient, less burdensome, or less expensive.

Request for Production No. 23: Produce copies of all firm order confirmations and similar documents in which BellSouth authorizes the conversion of virtual collocation arrangements to physical collocation arrangements without requiring the relocation of the requesting carrier's virtually collocated equipment.

Objection: BellSouth objects to this request for production on the grounds that it is overly broad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. BellSouth further objects to this request for production on the grounds that it seeks the production of customer proprietary information which cannot be disclosed by BellSouth.

Request for Production No. 29: Produce copies of any and all documents (e.g., regulations, judicial or regulatory decisions, etc.), other than building codes, which BellSouth alleges affect space allocations.

Objection: BellSouth objects to this request for production on the grounds that it seeks the production of documents that are on file with the Tennessee Regulatory Authority, are publicly available and therefore are obtainable from another source that is more convenient, less burdensome, or less expensive.

Request for Production No. 32: Produce any and all documents that refer or relate to BellSouth's design practices as they relate to space allocations.

Objection: BellSouth objects to this request for production on the grounds that it is overly broad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Production No. 33: Produce copies of any and all documents that refer or relate to BellSouth's collocation practices (excluding design practices referenced above), including but not limited to, standard operating procedures for handling collocation requests.

Objection: BellSouth objects to this request for production on the grounds that it is overly broad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Production No. 34: Produce any and all documents filed by BellSouth in any generic collocation proceeding in Tennessee.

Objection: BellSouth objects to this request for production on the grounds that it is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. BellSouth further objects to this request for production on the grounds that it seeks the production of documents that are on file with the Tennessee Regulatory Authority and thus are publicly available. Subject to and without waiving these objections, BellSouth states that it is unaware of any generic collocation proceeding in TN.

Request for Production No. 36: Produce all documents that refer or relate to any request by telecommunications carriers, other than Intermedia, to provide them with an Enhanced Extended Link (EEL), as well as all documents referring or relating to BellSouth's response to any such request.

Objection: BellSouth objects to this request for production on the grounds that it is overly broad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Production No. 37: Produce copies of interim or final decisions in arbitration proceedings under Section 252 of the Communications Act or in any other proceeding under the Communications Act that address the issue of whether BellSouth should or should not provide EEL to requesting carriers.

Objection: BellSouth objects to this request for production on the grounds that it seeks the production of documents that are on file with the Tennessee Regulatory Authority, are publicly available and therefore are obtainable from another source that is more convenient, less burdensome, or less expensive.

Request for Production No. 38: Produce copies of all interconnection agreements between BellSouth and other telecommunications carriers (other than Intermedia) under Section 252 of the Communications Act, whether the interconnection agreement was reached through voluntary negotiations or compulsory arbitration.

Objection: BellSouth objects to this request for production on the grounds that it is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

BellSouth further objects to this request for production on the grounds that it seeks the production of documents that are on file with the Tennessee Regulatory Authority, are publicly available and therefore are obtainable from another source that is more convenient, less burdensome, or less expensive.

Request for Production No. 41: Produce all documents that refer, reflect, or describe

the network architecture used by BellSouth to deliver traffic to Internet Service Providers (ISPs).

Objection: BellSouth objects to this request for production on the grounds that the information requested is vague, overly broad, unduly burdensome and oppressive and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Production No. 42: Produce any and all cost studies prepared by or on behalf of BellSouth relating to Frame Relay.

Objection: BellSouth objects to this request for production on the grounds that it seeks the production of cost studies for BellSouth's retail services, the production of which is not relevant to the issues in this arbitration, nor is it reasonably calculated to lead to the discovery of admissible evidence.

Request for Production No. 45: Produce any and all documents that relate or refer to BellSouth's provisioning of access to packet switching capabilities on an unbundled basis.

Objection: BellSouth objects to this request for production on the grounds that the information requested is unduly burdensome and oppressive and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Production No. 49: Produce any and all documents that relate or refer to BellSouth's provisioning of Multiple Tandem Access (MTA).

Objection: BellSouth objects to this request for production on the grounds that it is overly broad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Request for Production No. 57: Produce any and all documents filed by BellSouth with the FCC, a state commission, or a court in which BellSouth challenges the requirement to

provide access to the UNEs, including combinations of UNEs, identified by the FCC in the *UNE Remand Order*.

Objection: BellSouth objects to this request for production on the grounds that it seeks the production of documents that are on file with the Tennessee Regulatory Authority, are publicly available and therefore are obtainable from another source that is more convenient, less burdensome, or less expensive.

Request for Production No. 58: Produce any and all documents filed by BellSouth with the FCC, a state commission, or a court in which BellSouth challenges the requirement to provide collocation as required by the FCC in the *Advanced Services Order*.

Objection: BellSouth objects to this request for production on the grounds that it seeks the production of documents that are on file with the Tennessee Regulatory Authority, are publicly available and therefore are obtainable from another source that is more convenient, less burdensome, or less expensive.

Request for Production No. 61: Produce copies of all arbitration decisions under Section 252 involving BellSouth in Tennessee.

Objection: BellSouth objects to this request for production on the grounds that it seeks the production of documents that are on file with the Tennessee Regulatory Authority, are publicly available and therefore are obtainable from another source that is more convenient, less burdensome, or less expensive.

Request for Production No. 62: Produce any and all documents that refer or relate to BellSouth's provisioning of adjacent collocation.

Objection: BellSouth objects to this request for production on the grounds that it is overly broad and unduly burdensome and not reasonably calculated to lead to the discovery of

admissible evidence.

Request for Production No. 64: Produce any and all documents relating to BellSouth's payment or nonpayment of reciprocal compensation to CLECs for the transport and termination of traffic to ISPs.

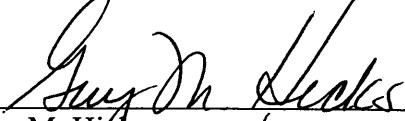
Objection: BellSouth objects to this request on the grounds that it is (1) vague, overly broad, and unduly burdensome and that (2) it is not relevant to the issues in this docket.

BellSouth further objects to the extent that this request seeks the production of confidential settlement documents which cannot be disclosed by BellSouth.

BellSouth further objects to the extent this request seeks documents which are publicly available.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.


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CERTIFICATE OF SERVICE

I hereby certify that on July 17, 2000, a copy of the foregoing document was served on the parties of record, via the method indicated:

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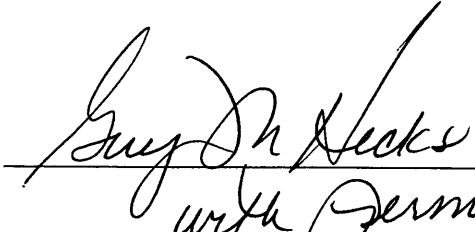
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